

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION

LINDA WILLIAMS,)	
)	
Plaintiff,)	
)	
vs.)	CASE NO. 1:06CV598-WKW
)	
ENTERPRISE CITY SCHOOL DISTRICT,)	
)	
Defendant.)	

MOTION TO EXTEND DEFENDANT'S EXPERT DISCLOSURE DEADLINE

COMES NOW the Defendant and herewith moves this Court to allow additional time to comply with Section 8 of the Court's Scheduling Order regarding disclosure of defense expert witnesses. As grounds for this Motion, the Defendant states as follows:

1. The Court's Scheduling Order required that the Defendant disclose experts who may be used at trial by September 15, 2007. The Court extended that disclosure deadline to October 15, 2007 pursuant to a motion filed by Defendant (docs. #50 and 51). As noted in that Motion, the Defendant served consolidated discovery requests on Plaintiff requesting various information, including the disclosure of treating physicians and medical providers (doc. #50). Defendant may use an expert(s) depending on the responses to the discovery served. Plaintiff is now over forty (40) days past due in responding to the Defendant's discovery requests. Defendant did file a Motion to Compel (doc. #52) and the Court has given the Plaintiff until October 18, 2007, to show cause why the Motion should not be granted (doc. #53). Thus far, Plaintiff has not submitted the overdue discovery responses or contacted Defendant's counsel regarding such.

2. Defendant requests an additional forty-five (45) days from October 15, 2007, to file the

information required per Section 8 of the Court's Scheduling Order. Defendant states that granting this Motion will not prejudice the Plaintiff or hamper the progress of this case and will serve the interests of justice.

/s/ R. Rainer Cotter, III
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Attorney for Defendant

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CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing on the following attorney of record, by electronic mail through the State of Alabama Electronic Filing system, and/or by placing the same in U.S. Mail, postage prepaid and properly addressed, on this 11th day of October, 2007:

J. Victor Price, Esq.
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/s/ R. Rainer Cotter, III

OF COUNSEL